

Abbots Langley Parish Council



Parish Council's Response to Three Rivers District Council's Local Development Framework

March 2009

www.abbotslangley-pc.gov.uk

Abbots Langley Parish Council

Response to Three Rivers District Council Local Development Framework - March 2009

Detailed below is Abbots Langley Parish Council's response to the Three Rivers District Council's Local Development Framework consultation. Individual members may submit responses in their own right to the LDF, or specific parts thereof, as they are entitled to do.

The Parish Council is also encouraging residents, businesses and community groups to respond to the consultation.

This response was considered and resolved at the Parish Council's meeting held on 9th March 2009, to which the press and public were invited and as such this should be recorded as the response of the Parish Council, rather than that of its individual members.

Introduction

1. The Parish Council notes with concern that the Government, through its East of England Plan, has required Hertfordshire local authorities to identify sites for an additional 85,000 dwellings and has set a target of 68,000 jobs by 2021. This Council is deeply concerned that our local MP has not opposed, in particular, the housing targets for this area.

It considers with great concern that the infrastructural support required for such extensive housing build has not been fully taken into account and regrets that Three Rivers has been imposed with a target of 4,000 new dwellings and some 2378 new jobs. It notes that Three Rivers is required by law to identify these sites in its LDF and that these, subject to public consultation, are considered the "least worst" options.

2. This council believes that the way the current LDF is written places an unacceptable burden on the Abbots Langley Civil Parish area. It does not take into account the additional building that has taken place in the last 15 years, that has generated in excess of 5,000 new units. It is particularly concerned that of the identified new sites the Civil Parish of Abbots Langley is expected to take 52% of the housing development and that some of these sites will have a clear impact on the Green Belt and should be rejected.

It is concerned that the Housing Selection Sites criteria has given an undue weighting to sites close to current urban locations, placing a disproportionate burden on Abbots Langley.

It is surprised to find that the principal town of the district, Rickmansworth, has no larger housing sites included, whereas Abbots Langley as the largest village area is expected to accommodate significant extra development, but has few additional improved services identified to support this in PSP2 (Place Shaping Policy.)

3. The Parish Council recognises that some of the sites identified are acceptable as "least worst" options. In the Parish Council's detailed comments we call upon Three Rivers Council to reject the housing sites that this Parish Council opposes and in particular to include in the LDF the need to provide for and protect the Green Belt wedges that separate the core of Abbots Langley and Bedmond (from each other) and from Watford to the south, Hemel Hempstead to the north and St Albans to the East.
4. The council is concerned that the additional 12,000 dwellings required in Dacorum Borough Council's area, to which the parish adjoins, is likely to create an urban extension of Hemel Hempstead and that this could place an additional burden on the infrastructural services in this parish area of which no account has been taken.

The Council is further concerned that of the sites identified the County Council did not see fit to object to the inclusion of any of them on traffic or highways grounds, despite the likely additional congestion that could be created.

In addition no objections were raised by the County Council to the changes that would be required to existing narrow rural lanes to accommodate the additional traffic; this particularly applies in the case of the Woodside Road site.

Abbots Langley Parish Council

5. The Parish Council firmly supports the approach taken by Three Rivers Council over its opposition to the imposition of 15 additional gypsy and travellers pitches (one new site), imposed by the East of England Regional Assembly and welcomes the continued opposition of Three Rivers Council to the sites the consultant proposed in the Abbots Langley Parish.
6. Should as a result of this consultation any proposals from land owners or developers for any new sites not already detailed come forward, this Council would expect further consultation with it and the public by Three Rivers Council.

The Parish Council urges all Abbots Langley Parish residents to take part in the consultation and to support the Parish's views over the individual issues. The Clerk to the Council will be making this document available through the Council Offices, website and notices in the parish area.

Abbots Langley Parish Council

Detailed Comments

Ref./Page No.	Issue	Proposal / Comment
PSP2 - p.34-35	Preferred Policy Approach - Abbots Langley	<p>Remove proposed Woodside Road development.</p> <p>Include following under provision of, and access to, services and facilities to meet future demands</p> <ul style="list-style-type: none"> • Improvements to bus services linking Abbots Langley to Watford/Watford Junction/ Health Campus and Hemel Hempstead. • Traffic improvements to C76 route. • Improvement of cycling and Parking facilities at Kings Langley Station. • Enhancement of existing play and open spaces including where applicable parking provision.
PSP4- p.37-38	Preferred Policy Approach- Bedmond	<ul style="list-style-type: none"> • As above plus traffic management scheme for Toms Lane.
7.36 - p.47	Strategic Market Housing Assessment predicts population to rise by 1200 people, so why do we need to build 1688 new homes and also households will rise by 2,900. These figures taken together do not correlate.	How many houses do we actually need if population is only likely to rise by 1200?
Chapter 7 - p.39	<p>Housing Targets</p> <p>The Plan proposes 1688 new homes, split across the district:-</p> <ul style="list-style-type: none"> • Watford Rural 375 22% • Croxley Green 135 8% • Chorleywood 10 ½% • Sarratt 10 ½% • Unparished areas 278 16% • Abbots Langley 880 52% <p>The Parish Council questions the criteria by which sites are identified.</p> <p>It would seem that the criteria is basically determined by already having housing and therefore infra structure in the area. Consequently any new housing will always gravitate towards existing housing; thus putting greater pressures on already stretched areas and enabling other areas to avoid having to take any new housing.</p>	We oppose this as being unfair distribution and request that the District Council review this to apportion new house building more equitably across the whole district.

Abbots Langley Parish Council

Ref./Page No.	Issue	Proposal / Comment
Chapter 7 - p.39	<p>We note that a number of the small sites in the Parish are in private ownership. Notably:-</p> <ul style="list-style-type: none"> • Former Kings head PH • Working Men’s Club • Breakspeare Public House <p>At a time of credit crunch; there is concern that this could blight those premises and businesses</p>	<p>The Parish Council requests the District Council enter into urgent discussions with the owners of these premises to ascertain whether they will release these sites for house building and if they won’t, immediately remove them from the list. Note: The Working Men’s Club has already informed TRDC that it is not an available site and therefore the Parish Council supports its removal from the list.</p>
CP3 - p.48	<p>Parish welcomes the housing density of 30 dwellings per hectare</p>	<p>Reject any ‘higher’ density for the larger sites, which will predominantly be in Abbots Langley and therefore will place a disproportionate amount of high density housing in this Parish and will create a Parish of high density housing estates.</p>

Abbots Langley Parish Council

Site Specific Consideration and Comments

Page	Site	Comment
p.144	Leavesden Aerodrome	<p>Accept as this has already received outline permission as a Brownfield site subject to the Green Belt wedges to the north namely the “horse field” and the Furtherfield Sites becoming public open space and that ensuring the Green belt here prevents the urban link of Abbots Langley with Watford.</p> <p>Would urge that any development here would be principally accessed via Aerodrome Way, provide for improved bus access to Watford and Abbots Langley and measures taken to protect the neighbouring employment land at Leavesden Studios</p> <p>Would ask that the Council investigate that within the lifetime of the plan that the current unoccupied offices be converted to dwellings or mixed use, ie: the regional Police HQ, negating any green belt usage in the parish.</p>
p.145	Woodside Road	<p>Rejected by PC as a totally unacceptable incursion into the Green belt that would place further pressure on neighbouring green belt for urbanisation of the area between Orchard Avenue and High Elms Lane.</p> <p>This site in any event has very limited access to public transport and primary education. It currently acts as a vital Green lung to the east of Leavesden/ Watford.</p>
p.148	Kings Langley Employment Area	<p>The Parish Council would support high quality development in this area, resolving the current conflict between industrial and housing. This would be subject to securing further traffic and environmental improvements along the C 76 and enabling the upgrade of existing public amenities (in particular Primrose Hill) as part of any agreed developments.</p> <p>The plan should address “small plot developments”; these should be avoided in particular in this area which is already a very mixed and randomly developed part of the parish. Consideration should be given to preparing a planning brief for the area.</p> <p>Members have indicated that HGV traffic in this area is a major problem and would need to be addressed as part of the plan.</p>

Abbots Langley Parish Council

Page	Site	Comment
p.145	Former Kings Head Public House - High Street	Parish Council request withdrawal from list unless site owner indicates that they may be prepared to release land.
p.145	Working Men's Club - Trowley Rise	Parish Council request withdrawal from list as site owner indicates they are not prepared to release land.
p.151	Gade View Gardens	Noted - already being developed.
p.152	Breakspeare Public - School Mead	Parish Council request withdrawal from list unless site owner indicates that they may be prepared to release land.
p.156	Love Lane	Parish Council reject the site as a totally unacceptable incursion into Green Belt. It has potential to create further adjacent development sites in future, that would place further pressure on neighbouring green belt.
p.156	Leavesden Pumping Station	Reluctant acceptance as this is a Brownfield site already developed, although it is in Green Belt. Could be developed earlier than the timeframe given but would require improvements as part of any planning permissions to protect the neighbouring Leavesden Hospital Cemetery and improvements to the access road.
p.157	Bluebell Drive	Reluctant acceptance as although this site is in Green Belt, development it is on a former tip site and this would logically 'square off' existing development. This could be brought forward for development earlier.
p.157	South Toms Lane	Reject as incursion into Green Belt. However would reluctantly accept as a last resort if its inclusion enabled the council to protect the Green belt to the south from any further development (Numbers Farm) by squaring of the current road.
p.157	Three Acres, Toms Lane	Accept as this will tidy up an existing self contained Brownfield site, albeit in the green belt, subject to resolving what is a constrained access.

Abbots Langley Parish Council

Page	Site	Comment
p.159	Langleybury House	Accept site. The Parish Council would question whether the site could be expanded to Brownfield area to north-west of proposed area thus accommodating more units again reducing pressure on virgin Green belt elsewhere in the Parish. Any development here should be part of a comprehensive plan to ensure high quality residential development that also secures Section 106 monies for use in the immediate vicinity to address the lack of amenities.
p.159	Furtherfield Depot	Accept site as already brownfield subject to the housing being of no more than a similar density to the neighbouring Furtherfield area. (Equivalent to 30 dwellings/hectare)

Abbots Langley Parish Council

Other Comments on LDF

Ref./Page No.	Issue	Proposal / Comment
7.66 - p.53	Gypsy and Traveller sites	<p>The Parish Council supports TRDC's rejection of the Scott Wilson Report on Gypsy and Traveller sites</p> <p>The council believes that the allocation of G&T sites should be based on need and the ALPC / TRDC area is not an area where migratory workers and travellers are normally employed. We recommend that sites should be allocated where they will be needed by their occupiers, not on an even regional distribution. It supports the rejection of suggested sites in the Abbots Langley Parish as inappropriate and without need or merit.</p>
CP6 - p.58	Employment opportunities.	The Parish Council supports the proposals to encourage employment opportunities.
CP7 - p.63	Town centre and shopping	Parish welcomes the town centre and shopping objectives and in particular A1 usage in the primary frontage.
7.118- p.66	M25 Widening/ Integrated Demand Management	<p>Whilst accepting with regret the decision has already been made on the former, this Parish voices its concerns that Integrated Demand Management effectively restricting access to the M25 at junctions 21 or 19 could have a commensurate detrimental effect on local routes through the Parish and therefore expects full engagement over those issues with the Highways Agency and the County Council before decisions are taken.</p>

Abbots Langley Parish Council

Ref./Page No.	Issue	Proposal / Comment
CP8 - p.69 to p.72	Transport	<p>Parish welcomes the transport proposal, but would also like to see the following:-</p> <ol style="list-style-type: none"> 1. Retention and support of the Abbots Langley Flyer 318 route. 2. Improved bus services between the existing and proposed estates, including hopper type services and the between village centres and stations (Watford Junction & Kings Langley) including buses running to the station at commuter travel times. 3. Improved facilities for safe parking of cycles in the village centre; local parks; outlying shopping centres (Bedmond and Katherine Place) and the station - including lockable cycle boxes. 4. Parish welcomes the desire to improve station parking; but that facility needs to be affordable to encourage people to use trains rather than their cars. 5. Create a zone bounded by C76 & C77; Hyde Lane and South Way - inclusive; (M25 excepted) in which larger HGV's are banned - in order to discourage through HGV (rat running) traffic. Although is accepted HGV access would be required during working days. 6. Consideration should be given to the introduction of 20mph limits to assist in safety and traffic flows.
CP9 - p.76	Preferred Policy Approach for Infrastructure and Planning	<p>The preferred policy approach for infrastructure and planning are too vague.</p> <p>To support the growth across the district we need:-</p> <ul style="list-style-type: none"> • More schools - both JMI and secondary + college places • More health services; GPs; clinics; social and care services • Community facilities and activities especially for young people and older people. • Water resources • Maternity provision and improved services for the youngest and most vulnerable members of our community. Provision for home births and small local birthing centres.

Abbots Langley Parish Council

Ref./Page No.	Issue	Proposal / Comment
DC1 - p.82 & DC4, 5 & 6	Preferred Policy Approach - Green Belt-	<p>The preferred approach should be to “Only allow development on virgin Green Belt as a last resort”</p> <p>The Parish Council strongly supports the retention of the Green Belt where it provides a strategic role to prevent urban sprawl and maintain openness, in particular:</p> <ul style="list-style-type: none"> • Green space between Abbots Langley and Watford • Green space between Abbots Langley and Hemel Hempstead. • Green space between Abbots Langley and Bedmond Village <p>Abbots Langley must remain a separately identified community, not part of “Greater Watford” or “Greater Hemel Hempstead”.</p> <p>Some members were passionate that the Green Belt be retained and protected for health reasons.</p>

Abbots Langley Parish Council

Ref./Page No.	Issue	Proposal / Comment
Para 8.48 - p.92	Open space, sport and recreation.	<p>The Parish Council is disappointed that this section does not reflect the work of the Parish Council as the principal provider of open space, sport and recreation facilities in the area. Specific reference should be made to:-</p> <ul style="list-style-type: none"> • Henderson Hall - the NE of the district principal arts venue • (new) Hillside Hall - potential as a venue for community events and classes • Bedmond Hall - potential as a venue for community events and classes • Open space and parkland - including play areas, which need upgrading, modernising and making relevant to a diverse age range. • Allotments, where demand currently exceeds provision. These will become increasingly relevant as in years to come residents will want to grow more of their own food. <p>The Parish Council would wish to discuss with TRDC an integrated leisure, open space and recreation plan for the Parish.</p> <p>The Parish Council would expect the policies to include enhancement of existing facilities for public use whilst not necessary the provision of duplicate new ones during the life time of the plan</p> <p>Consideration should also be given to the provision of new amenity space. Whilst members appreciate the 10% amenity space rule on new developments, this should avoid small relatively useless pockets of land that have little amenity value. Current amenity provision should be taken into consideration, as should safe walking and cycle access.</p>
DC2- p86	Preferred Policy Approach - Biodiversity, Tree, Woodland.	<p>This policy ends to be more embracing including the provision of biodiversity of open spaces such as the Hunton Bridge roundabout, large tracks of verges and parts of Leavesden Country Park becoming a wildlife site.</p> <p>The policies do not currently cover the need to protect road side hedge rows from erosion and the appropriate replanting and maintenance.</p> <p>As technology develops, consideration should be given to methane extraction methods, to enable sites where methane is currently being vented being made available for development or for public open space.</p>

Abbots Langley Parish Council

Ref./Page No.	Issue	Proposal / Comment
DC7 & 8 - p.101	Preferred Policy Approach design of development	<p>The Parish Council strongly welcomes the “Design of Development” approach and the residential design and layout.</p> <p>The parish wishes to retain the diversity of design styles and the semi rural aspect of Abbots Langley. We would like to see estates being developed with a range of house building styles; rather than a high proportion of standard designs.</p> <p>Consideration needs to be given to the size of garages so they can fit an averaged sized family car, to reduce street parking, also the size of gardens must be appropriate to allow residents to grow some of their own food.</p>
DC10, 11 & 12 p.108-p.115	Preferred Policy Approach- Emissions and Energy; Renewables and Waste	<p>The Parish Council welcomes TRDCs proposals in this area; however we would wish to enter into a further dialogue with the District Council to develop a joint Greening agenda for the Parish.</p>

Abbots Langley Parish Council

The following addendum to the Parish Council's response was submitted on 3rd April 2009, following the Annual Parish Meeting.

The submission of these additional comments was agreed with Three River's District Council, due to the timing of the Annual Parish Meeting.

Abbots Langley Parish Council submitted a comprehensive response to the LDF by email on 18th March 2009. Last night the Parish Council held its Annual Parish Meeting, where residents get to discuss topics of their choice with Councillors. There were 42 members of the public present. The LDF was the "hot topic".

As previously agreed, following are the comments that came out of the meeting. Many of the comments made were in line with the Parish Council's original response, so they have not been repeated.

- Residents were concerned about the possibility of development on the Bluebell Drive (BP27) site, particularly given the problems with methane on the site.
- Traffic problems in the Roman Gardens and Primrose Hill corridor, need for a comprehensive development plan for this area, which avoids lots of small disconnected developments and addresses the traffic issues.
- What provisions is there for water supply to these developments? Some areas of the Parish have been suffering from water pressure problems.
- There was concern about high density development and a call for densities of less than 30 units per hectare.
- Building around the Love Lane reservoir (AB35) will preclude any future expansion of this facility, this maybe not of immediate concern, but could be very relevant in the future.
- Schools and open spaces are vital. Not just school extensions, proper purpose built modern facilities. Also, large tracts of open spaces for play and adventure, not just the relatively useless small children's play areas on many new developments.

The single most common thread in all of the issues raised was "Why Abbots Langley"? Whilst there was a realisation that sites such as Leavesden Aerodrome, with the recent development and new roads, may represent a practical solution. Many of the other developments in the Parish did not. There was a strong feeling from most of the meeting participants that areas such as Chorleywood and Sarratt had virtually no new development proposed in their area and this placed an unacceptable burden on the Abbots Langley civil parish.

The meeting was wholly behind the position taken by the Parish Council in its response to the LDF, it is difficult in written form to convey the real anxiety felt by residents at the effect the developments could have on the area and the disproportionate effect of the emphasis on the Abbots Langley area, these were not just NIMBY comments, they were reasoned arguments that had been carefully considered.

There was unanimous support for the Parish's view that the plan failed to address adequately the lack of infrastructural support to accommodate these and neighbouring developments.